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May 29, 2009

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Hon. Freda L. Wolfson, U.S.D.J.
 Clarkson S. Fisher Federal Building and U.S. Courthouse
 402 East State Street, Room 5050
 Trenton, New Jersey 08608

Re: Siamak Matt Ghaffari v. Benjamin M. Hern
 Case No. 06-931 (FLW)

Motion for Summary Judgment

Dear Judge Wolfson:

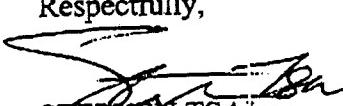
This office serves as co-counsel to Siamak Matt Ghaffari, the Plaintiff in the above-referenced matter.

We respectfully request an adjournment of the Motion for Summary Judgment filed by the Defendant Benjamin Hern and an extension of the time to respond to the Motion. The Motion is currently returnable June 15, 2009, and the Plaintiff's response is due June 1, 2009.

We have already spoken with Mr. Hern's attorney, Mr. Sciarrabone, and he graciously consents to a two-week extension.

We very much appreciate the Court's Consideration of this matter. Thank you.

Respectfully,

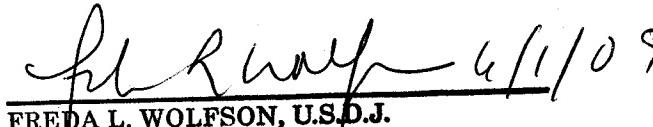

STEPHEN TSAI

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cc: Thomas C. Sciarrabone, Esq. (via facsimile (732) 758-0799)
 Edward F. Siegel, Esq. (via facsimile (216) 831-6584)

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IT IS SO ORDERED:


 FREDA L. WOLFSON, U.S.D.J.